UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN

2025 MAY 28 P 12: 33

UNITED STATES OF AMERICA,

Plaintiff,

25-CR-109

٧.

[18 U.S.C. §§ 1466A, 2252A(a)(2)(A) & 2260A]

DAVID E. DEJANOVICH,

Defendant.

Green Bay Division

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about April 29, 2024, in the State and Eastern District of Wisconsin and 1. elsewhere,

DAVID E. DEJANOVICH

did knowingly receive a visual depiction of a minor engaging in sexually explicit conduct that is obscene and had been communicated and transported in interstate and foreign commerce by any means, including by computer.

2. The visual depiction received by the defendant included a digital image identified by the following partial file name:

Partial Filename	Description
Cf9b.0	A digital image depicting an adult male naked from the waist down. Two children appear in the images as well. One child is in a diaper and appears to be of infant or toddler age. The

Partial Filename	Description
	second child, a prepubescent female approximately 5-7 years of age, is lying on the other child while the adult male has his erect penis in the child's vagina.

All in violation of Title 18, United States Code, Section 1466A(a)(1).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about April 30, 2024, in the State and Eastern District of Wisconsin and elsewhere,

DAVID E. DEJANOVICH

did knowingly receive a visual depiction of a minor engaging in sexually explicit conduct that is obscene and had been communicated and transported in interstate and foreign commerce by any means, including by computer.

2. The visual depiction received by the defendant included a digital image identified by the following partial file name:

Partial Filename	Description
6b4d.0	A digital image depicting a naked prepubescent female in the range of 3-6 years of age, seated on the lap of a naked male adult. The child's legs are being held apart. His semi-flaccid penis is visible, touching the anal area of the child. It appears the male ejaculated on the child's vaginal area.

All in violation of Title 18, United States Code, Section 1466A(a)(1).

COUNT THREE

THE GRAND FURTHER JURY CHARGES THAT:

1. On or about April 29, 2024, in the State and Eastern District of Wisconsin and elsewhere,

DAVID E. DEJANOVICH

knowingly received child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), using a means and facility of interstate and foreign commerce, that had been mailed, shipped, and transported in and affecting interstate and foreign commerce, and which contained material that had been shipped and transported by a means and facility of interstate and foreign commerce, including by computer.

2. The child pornography received by the defendant included a digital video identified by the following partial file name:

Partial File Name	Description
	A digital image depicting a juvenile between approximately 5-7 years of age being forced to perform oral sex on an adult male.

All in violation of Title 18, United States Code, Section 2252A(a)(2)(A).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 29, 2024, in the State and Eastern District of Wisconsin and elsewhere,

DAVID E. DEJANOVICH,

an individual who has a prior conviction for First Degree Sexual Assault of a Child in the State of Wisconsin, and who is required by federal or other law to register as a sex offender, committed a felony offense involving a minor under Title 18, United States Code, Section 1466A, as charged in Count One of this indictment.

In violation of Title 18, United States Code, Section 2260A.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 30, 2024, in the State and Eastern District of Wisconsin and elsewhere,

DAVID E. DEJANOVICH,

an individual who has a prior conviction for First Degree Sexual Assault of a Child in the State of Wisconsin, and who is required by federal or other law to register as a sex offender, committed a felony offense involving a minor under Title 18, United States Code, Section 1466A, as charged in Count Two of this indictment.

In violation of Title 18, United States Code, Section 2260A.

FORFEITURE NOTICE

Upon conviction of Count One, Count Two, or Count Three in the indictment, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1467, all obscene material produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Section 1466A or Title 18, United States Code, Section 2252A(a)(2)(A) and shall forfeit any property, real or personal, used or intended to be used to commit or promote the commission of such offenses.

A TRUE BILL:

POREPERSON

Dated: 5-28-25

RICHARD G. FROHLING

Acting United States Attorne